REMARKS

The Office Action mailed February 9, 2009 has been carefully reviewed and the foregoing remarks have been made in consequence thereof.

Claims 1-22 are now pending in this application. Claims 1-8 stand rejected. Claims 9-22 are withdrawn from consideration.

The rejection of Claims 1-8 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement, is respectfully traversed.

Claim 1 recites a method for operating a facility having a plurality of equipment combinations, each equipment combination is operable interactively with at least one other equipment combination, said method comprising "receiving a plurality of measured process parameters, in real-time, for each of the plurality of equipment combinations, wherein the equipment combinations include at least a driver machine and a driven machine . . . determining at least one derived quantity from at least one measured process parameter associated with at least a first of the equipment combinations and from at least one measured process parameter associated with at least a second of the equipment combinations, wherein the at least one derived quantity is compared to a measured process parameter to verify an operability of at least one sensor . . . and recommending a change to an equipment operation based on the measured process parameters and the at least one derived quantity."

As originally filed, Claim 1 recites "a plurality of equipment combinations" and "at least one other equipment combination". In addition, paragraph [0021] describes analyzing "combinations of drivers and driven components, and process parameters associated with each combination". Moreover, paragraph [0043] describes "equipment combinations". Accordingly, Applicants respectfully submit that one of ordinary skill in the art would understand the recitation of "a plurality of equipment combinations" and the description of combinations of equipment, and that in such combinations , 'at least a first of the equipment combinations' and 'at least a second of the equipment combinations' would be included. In addition, Applicants submit that one of ordinary skill in the art would understand that the

description of "process parameters associated with each combination" in paragraph [0021], would include 'at least one measured process parameter', and that the at least one parameter is associated with 'at least a first' and 'at least a second' of the above equipment combinations. For at least the reasons set forth above, Applicants respectfully submit that Claim 1 satisfies the written description requirement of 35 U.S.C. §112.

Claims 2-8 depend from independent Claim 1. When the recitations of Claims 2-8 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-8 likewise satisfy the written description requirement of 35 U.S.C. §112.

For at least the reasons set forth above, Applicants respectfully request that the Section 112 rejection of Claims 1-8 be withdrawn.

The rejection of Claims 1-8 under 35 U.S.C. §112, second paragraph, is respectfully traversed.

Claims 1, 2, 4 and 5 have each been amended to address the issues noted in the Office Action. As such, Applicants respectfully submit that Claims 1, 2, 4 and 5 satisfy the requirements of 35 U.S.C. § 112. Claims 3 and 6-8 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 3 and 6-8 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 3 and 6-8 likewise satisfy the requirements of 35 U.S.C. § 112, second paragraph.

For at least the reasons set forth above, Applicants respectfully request that the Section 112 rejection of Claims 1-8 be withdrawn.

The rejection of Claims 1-3 and 7 under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2003/0163288 to Follin et al ("Follin") is respectfully traversed.

Follin describes a method for remotely monitoring the operation of a turbine (12) using a turbine monitoring system (10). Control sensor data from turbine (12) is collected using an on-site monitor "OSM" (14), and the validity of the control sensor data is then determined. A calculation engine (25) processes the validated control sensor data and

determines unit performance characteristics, such as output and heat rate of turbine (12). The determined characteristics are then validated, and if data validation fails, calculation engine (25) may re-determine unit performance characteristics using control sensor data that can be validated. Such validation enables system (10) to determine whether sensor data is available or whether system (10) should use characteristics determined by calculation engine (25). Notably, Follin does not describe nor suggest determining at least one derived quantity from at least one measured process parameter associated with at least a first of equipment combinations and from at least one measured process parameter associated with at least a second of equipment combinations, wherein at least one derived quantity is compared to a measured process parameter to verify an operability of at least one sensor.

Follin does not describe nor suggest a method for operating a facility having a plurality of equipment combinations, as is recited in Claim 1. More specifically, Follin does not describe nor suggest receiving a plurality of measured process parameters, in real-time, for each of a plurality of equipment combinations, wherein the equipment combinations include at least a driver machine and a driven machine, determining at least one derived quantity from at least one measured process parameter associated with at least a first of the equipment combinations and from at least one measured process parameter associated with at least a second of the equipment combinations, wherein the at least one derived quantity is compared to a measured process parameter to verify an operability of at least one sensor, and recommending a change to an equipment operation based on the measured process parameters and the at least one derived quantity. Rather, in contrast to the present invention, Follin describes calculating unit performance characteristics based on validated control sensor data, and validating the calculated characteristics against measured sensor data from a turbine. Notably, Follin does not describe nor suggest recommending a change to equipment operation based on the measured process parameters and an at least one derived quantity. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Follin.

Claims 2-3 and 7 depend from independent Claim 1. When the recitations of Claims 2-3 and 7 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-3 and 7 likewise are patentable over Follin.

For the reasons set forth above, Applicants respectfully request that the Section 102(e) rejection of Claims 1-3 and 7 be withdrawn.

The rejection of Claims 4-6 and 8 under 35 U.S.C. §103(a) as being unpatentable over Follin in view of U.S. Publication No. 2006/0259163 to Hsiung et al ("Hsiung") is respectfully traversed.

Follin is described above.

Hsiung describes a process monitoring and control system that includes a software interface (162) that couples data from a processing plant to a plurality of processes for operations and analysis. Software interface (162) couples to server (166), and server sends the data to a data synchronization layer (167) then to a statistical layer (168) to analyze the data. System also includes expert systems (170) and model building (176) systems to predict behavior of the processes, as well as model monitoring (178) based on inputs from the processing plant, and compare the predicted behavior to measured inputs. The system also includes an output module, including display systems (184) and desktop applications (185). Notably, Hsiung does not describe nor suggest recommending a change to equipment operation based on measured process parameters and at least one derived quantity.

Claims 4-6 and 8 depend from independent Claim 1, which is recited above.

No combination of Follin and Hsiung describes nor suggests a method for operating a facility having a plurality of equipment combinations, as is recited in Claim 1. More specifically, no combination of Follin and Hsium descibe nor suggest receiving a plurality of measured process parameters, in real-time, for each of a plurality of equipment combinations, wherein the equipment combinations include at least a driver machine and a driven machine, determining at least one derived quantity from at least one measured process parameter associated with at least a first of the equipment combinations and from at least one measured

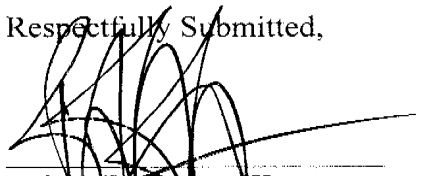
process parameter associated with at least a second of the equipment combinations, wherein the at least one derived quantity is compared to a measured process parameter to verify an operability of at least one sensor, and recommending a change to equipment operation based on the measured process parameters and the at least one derived quantity. Rather, in contrast to the present invention, Follin describes calculating unit performance characteristics based on validated control sensor data, and validating the calculated characteristics against measured sensor data from a turbine, and Hsiung merely describes a system for monitoring an industrial process and outputting its data analysis results. Notably, Follin does not describe nor suggest recommending a change to an equipment operation based on the measured process parameters and the at least one derived quantity. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Follin and Hsiung.

Claims 4-6 and 8 depend from independent Claim 1. When the recitations of Claims 4-6 and 8 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 4-6 and 8 likewise are patentable over Follin in view of Hsiung

For the reasons set forth above, Applicants respectfully request that the Section 103(a) rejection of Claims 4-6 and 8 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



Robert B. Reeser III
Registration No. 45,548
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070